## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

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v.

Case No. CR 24-080 RAW

JASON DALE COLE & CRYSTAL FAYE CHESSER,

Defendant.

## JOINT NOTICE OF SUBMISSION OF ELECTRONIC MEDIA EXHIBITS

The United States of America and Defendants hereby provide notice of submission of the following electronic media exhibits to the Court for an *in-camera* review, pursuant to this Court's Order (Dkt. #75).

On April 17, 2025, counsel for the United States hand-delivered one DVD containing the following files to the Court:

- Oklahoma Highway Patrol (OHP) Dashcam, total of 17 minutes and 30 seconds long, labeled "Dash Cam #1.mpg," of which the United States intends to play the entirety of the recording. This dash cam documents Defendant Cole eluding Trooper E.M. and Trooper E.M.'s ultimate arrest of Defendant Cole in a wooded area in Okmulgee County, Oklahoma, on November 18, 2023.
- OHP Dashcam, total of 1 hour, six minutes, and 44 seconds, labeled "Dash Cam Cont..mpg," of which the United States intends to play one portion of the recording.

Clip 1 from "Dash Cam Cont..mpg" (Starts at 00:00-8:22). This clip

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documents the audio of Trooper E.M.'s inventory of Defendant Cole's vehicle, and also documents Trooper E.M. placing Defendant Cole into custody in the front seat of his patrol car.

- Special Agent (SA) Lucas Keck's body camera footage, total of 9 minutes and 9 seconds long, labeled "IMG 0691," of which the United States intends to play the entirety of the recording. The body camera depicts a walk-through of Defendant Cole and Defendant Chesser's residence on November 18, 2023, prior to the search by law enforcement.
- Special Agent (SA) Lucas Keck's body cam, total of 4 minutes and 27 seconds long, labeled "IMG 1231," of which the United States intends to play the entirety of the recording. The body cam depicts Defendant Cole and Defendant Chesser's residence on November 18, 2023, after the search by law enforcement.
- Jail call made by Defendant Cole on December 3, 2023, labeled "20231203-0012-J COLE.mp3," total of 20 minutes and 0 seconds long, of which the United States intends to play one portion of the recording.

Clip 2 from "20231203-0012-J COLE.mp3," starts at (17:23 to 17:42). In this clip, Defendant Cole admits to speeding, which was one of the reasons Trooper E.M. attempted to initiate a traffic stop on Defendant Cole on November 18, 2023.

6:24-cr-00080-RAW

• Jail call made by Defendant Chesser on December 5, 2023, labeled "20231205-1928-C-\_CHESSER.mp3," total of 19 minutes and 10 seconds long, of which the United States intends to play one portion of the recording.

Clip 3 from "20231205-1928-C-\_CHESSER.mp3," starts at (8:34 to 9:13). In this clip, Defendant Chesser is discussing her charges with an unidentified woman. The woman asks about "the building" in reference to the outbuilding on Defendant Cole and Defendant Chesser's premises where over three kilograms of methamphetamine were seized by law enforcement on November 18, 2023.

Defendant Chesser states, "I don't go in the building...I told the cop I don't go in that building. He [in reference to Defendant Cole] asked me not to go in the building, so I don't go in the building...I don't have a key to the building...that's his building that's his shit," or words to that effect. The United States does not intend to use this clip in its case-in-chief but provides notice of this clip for rebuttal or impeachment purposes should Defendant Chesser elect to testify at trial.

• Jail call made by Defendant Chesser on November 21, 2023, labeled "crystal-chesser-11-21-2023-7-50-PM.mp3," total of 14 minutes and 1 second long, of which the United States intends to play one portion of the recording.

Clip 4 from "crystal-chesser-11-21-2023-7-50-PM.mp3," (Starts at 9:00 to 9:30). In this clip, Defendant Chesser is talking with an unidentified woman about the suspected drugs that were seized from the residence during the search warrant. During the conversation, both Defendant Chesser and the woman are

wondering why law enforcement believed they found fentanyl during the search of the residence. The woman asks if it was a gram of fentanyl, and Defendant Chesser states, "they said it was way more than that... I don't remember how much fentanyl they said there was, but they said a couple ounces. From where? Unless it was in the meth or something I don't know where they come up with that shit," or words to that effect. This statement is an admission that Defendant Chesser knew there was methamphetamine on the premises, which is relevant to her maintaining a drug involved premises.

- Surveillance footage from Defendant Cole and Defendant Chesser's residence on October 29, 2023, labeled "1698616799681.mp4," total of 18 seconds long, of which the United States intends to play the entirety of the recording. In this recording, Defendant Cole is seen walking into the outbuilding. This recording is relevant to show that Defendant Cole has access to the outbuilding, where three kilograms of methamphetamine were seized by law enforcement on November 18, 2023.
- Surveillance footage from Defendant Cole and Defendant Chesser's residence on October 29, 2023, labeled "1698631400071.mp4," total of 12 seconds long, of which the United States intends to play the entirety of the recording. In this recording, Defendant Cole is seen handing an unidentified man a rifle with a black scope on it. This recording is relevant to show Defendant Cole's knowing possession of firearms on November 18, 2023.

- Surveillance footage from Defendant Cole and Defendant Chesser's residence on October 30, 2023, labeled "1698669469762.mp4," total of 19 seconds long, of which the United States intends to play the entirety of the recording. In this recording, Defendant Cole is seen walking on his premises holding a rifle. This recording is relevant to show Defendant Cole's knowing possession of firearms on November 18, 2023.
- Surveillance footage from Defendant Cole and Defendant Chesser's residence on October 30, 2023, labeled "1698632973289.mp4," total of 12 seconds long, of which the United States intends to play the entirety of the recording. In this recording, Defendant Cole is seen walking into the outbuilding while talking to an unidentified man. This recording is relevant to show Defendant Cole's ability to access the outbuilding, which is where over three kilograms of methamphetamine were seized by law enforcement on November 18, 2023.
- Video of unidentified man shooting a pistol that has been modified into a machine gun, labeled "IMG\_1736.3gp", total of 4 seconds long, of which the United States intends to play the entirety of the recording. In this recording, man fires a machine gun. This video was sent in a text message to Defendant Cole on October 19, 2023, at 8:28 p.m., from the number xxx-xxx-2337. This recording is relevant to show Defendant Cole's knowledge of the "Glock switch" or "conversion device" on the back of the Glock 23Gen4 pistol that was recovered in

his truck after fleeing from Trooper E.M. on November 18, 2023.

- Video of unidentified man shooting a pistol that has been modified into a machine gun, labeled "IMG 1744.3gp", total of 6 seconds long, of which the United States intends to play the entirety of the recording. In this recording, man fires a machine gun. This video was sent in a text message to Defendant Cole on October 24, 2023, at 12:25 a.m., from the number xxx-xxx-2337. This recording is relevant to show Defendant Cole's knowledge of the "Glock switch" or "conversion device" on the back of the Glock 23Gen4 pistol that was recovered in his truck after fleeing from Trooper E.M. on November 18, 2023.
- Surveillance footage from Defendant Cole and Defendant Chesser's residence on August 17, 2023, labeled "1692279547485.mp4," total of 18 seconds long, of which the United States intends to play the entirety of the recording. In this recording, Defendant Cole is seen holding a rifle on the porch of his residence. This recording is relevant to show Defendant Cole's knowing possession of firearms on November 18, 2023.

Defendants object on all grounds, including, without limitation, hearsay, relevance, and Rule 403.

Respectfully Submitted,

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## **CERTIFICATE OF SERVICE**

I, hereby certify that on April 17, 2025, I electronically transmitted the attached documents to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

Rhyder Jolliff Attorney for Defendant Cole
Dan Medlock Attorney for Defendant Chesser

s/ <u>Michael E. Robinson</u>
MICHAEL ROBINSON
Assistant United States Attorney